Postal Regulatory Commission Submitted 9/19/2011 8:00:00 AM Filing ID: 75846 Accepted 9/19/2011

BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE TO VALPAK INTERROGATORY VP/USPS-T1-10

The United States Postal Service hereby provides an institutional response to the above-referenced interrogatory of the Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc. dated August 30, 2011. The interrogatory has been redirected from witness Boldt to the Postal Service for an institutional response. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF VALPAK REDIRECTED FROM WITNESS BOLDT

VP/USPS-T1-10.

Please refer to Docket No. N2009-1, Postal Service Response to VP/USPS-T1-9(a), Tr. 2/289-290. According to that response, the Postal Service then had approximately (i) 61,321 full-time equivalent retail associates and (ii) 13,751 working postmasters at approximately 32,000 locations.

- a. Please update and provide the above figures with the current or most recently available data.
- b. At the time those data were supplied, what percentage of the total work force did the 61,321 full-time equivalent retail associates and approximately 13,751 working postmasters represent?
- c. In a recent White Paper, the Postal Service projects a need in FY 2015 for only 425,000 employees. If the total workforce is reduced to 425,000 employees in FY 2015, under current plans, would not (i) full-time equivalent retail associates and (ii) working postmasters represent a higher percentage of total employees in FY 2015 than reported in Docket No. N2009-1?

RESPONSE

(a) As of September 12, 2011: Total USPS Employee Count

645,982 (Career & Non-Career)

Retail Associates	63,310
Postmaster Occupations Relief/Replacement (OIC)	19,649 (1,961)
Adjusted Postmaster Count	17,688

- (b) The total postal workforce at the end of FY 2009 was 712,082 (Career & Non-Career).
- (c) Plans for achieving targets through 2015 will have to be developed and implemented before it can be projected how ratios of different types of employees between 2009 and 2015 might compare. However, such information does not appear to have any bearing on the issue of whether the nature of the service changes expected to result from the RAO Initiative comports with the policies of Title 39.